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2011 Annual Progress Report and Master Schedule Update

**Remedial Investigation/Feasibility Study
Peoples Gas Light and Coke Company
Former Manufactured Gas Plant Sites**

CERCLA V-W-08-C-917

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FIGURES

Figure 1 Master Schedule

ACRONYMS

ARAR	Applicable or Relevant and Appropriate Requirements
BMc	Burns and McDonnell
CSM	Generalized Conceptual Site Model
FS	Feasibility Study
FSP	Field Sampling Plan
HASP	Health and Safety Plan
IEPA	Illinois Environmental Protection Agency
IBS	Integrus Business Support, LLC
MGP	Manufactured Gas Plant
NRT	Natural Resource Technology, Inc
OU	Operable Unit
PGL	Peoples Gas Light and Coke Company
QAPP	Quality Assurance Project Plan
RAF	Risk Assessment Framework
ROD	Record of Decision
RI	Remedial Investigation
RPM	Remedial Project Manager
SOW	Statement of Work
SSWP	Site-Specific Work Plan
USEPA	U S. Environmental Protection Agency

1 INTRODUCTION

1.1 Scope

This Annual Progress Report has been prepared in accordance with Task 8, Subtask 8.2 of the Statement of Work (SOW) attached to the Settlement Agreement and Administrative Order on Consent (Settlement Agreement) between the U.S. Environmental Protection Agency (USEPA) and Peoples Gas Light and Coke Company (PGL), a subsidiary of Integrys Energy Group, effective October 31, 2008. Also included in this report is a Master Schedule Update that includes the general schedule for Remedial Investigation/Feasibility Study activities at each Site. The Annual Progress Report and Master Schedule Update addresses PGL's former manufactured gas plant (MGP) Sites located in Chicago, Illinois. The sites include Crawford Station, North Branch Site (consisting of Division Street Station Operable Unit (OU), North Station OU, and Willow Street-Hawthorne Avenue Station OU), North Shore Avenue Station, and South Branch Site (consisting of 22nd Street Station Upland OU, Hough Place Station Upland OU, South Station Upland OU, Throop Street Station OU and South Branch River OU). Integrys Business Support, LLC (IBS) manages the former MGP sites for PGL.

1.2 Overview

This report addresses the following

Section 2: Multi-Site Document Progress

Section 3: Site Progress

Section 4: Proposed Master Schedule

Section 5: References

2 MULTI-SITE DOCUMENTS

Under the Settlement Agreement and SOW, Multi-Site documents are used to set forth general approaches and concepts to streamline subsequent site-specific work plans and minimize review times. The Multi-Site Remedial Investigation (RI) documents are used to maintain a consistent approach to investigate and assess potential risk at each site. The Multi-Site Feasibility Study (FS) Support Documents are used to develop general response actions and technologies appropriate for MGP sites.

This section summarizes the status of the Multi-Site Documents.

2.1 Multi-Site RI Documents

USEPA has approved all Multi-Site RI Documents submitted between May 7, 2007 and September 8, 2008. The Multi-Site RI Documents set forth a consistent approach for Integrys Energy Group's Illinois and Wisconsin-based subsidiary companies under the USEPA's lead. Section 1.2.1 of the SOW discusses the Multi-Site RI Documents which include:

- ❑ Multi-Site Quality Assurance Project Plan – Revision 2, September 4, 2007 (QAPP, 2007(c)),
- ❑ Multi-Site Health and Safety Plan – Revision 2, August 2, 2007 (HASP, 2007(a)),
- ❑ Generalized Conceptual Site Model – Revision 0, August 5, 2007 (CSM, 2007(b)),
- ❑ Multi-Site Risk Assessment Framework – Revision 0, September 5, 2007 (RAF, 2007(d)), and
- ❑ Multi-Site Field Sampling Plan – Revision 4, September 8, 2008 (FSP, 2008(a)).

As discussed at the December 2010 technical meeting (discussed in Section 2.4), a RAF Addendum was submitted to the USEPA on April 20, 2011 (Exponent, 2011(a)) to incorporate the Regional Screening Levels (RSL) into the hierarchy for human health screening levels and to further develop the approach to assessing potential vapor intrusion issues. USEPA comments were not received on the RAF Addendum but a conference call was held on September 28, 2011 to discuss the RSLs. This is further discussed in Section 2.4.

Site-Specific Work Plans (SSWP) are based on the Multi-Site documents and include modifications, as necessary, to reflect site-specific conditions. For instance, a site-specific CSM is included in each SSWP, and it presents pathways documented in the Generalized CSM as well as the rationale regarding why or why not a specific pathway is carried through into the baseline risk assessment for that site.

2.2 Multi-Site FS Support Document

USEPA approved (USEPA, 2010(d)) the March 26, 2010 Multi-Site FS Support Document dated April 20, 2010 (FS Support Document, 2010(c)). The Multi-Site FS Support Document includes general response actions and preliminary remedial technologies for Integrys Energy Group's Illinois and Wisconsin-based subsidiary companies under the USEPA's lead.

SOW Section 1.2.2 discusses the Multi-Site FS Support Document which includes

- Preliminary Remedial Technology Screening,
- Preliminary List of Possible Applicable or Relevant and Appropriate Requirements (ARAR); and
- Preliminary Permitting/Equivalency Requirements

Site-Specific FS evaluations and the Detailed Analysis of Alternatives (FS Report) for each site are based on the Multi-Site FS Support Document.

2.3 Multi-Site Document Status

The following table summarizes the status of the Multi-Site Documents.

Document	Submittal Date	Written USEPA Comments Received
2010 Annual Progress Report and Master Schedule Update (NRT, 2010(n))	October 28, 2010	--
Risk Assessment Framework Addendum (Exponent, 2011(b))	April 20, 2011	---

2.4 Multi-Site Meetings

During this reporting period, one multi-site technical meeting and one conference call was conducted to discuss specific technical issues. These meetings/conference calls provide the basis for technical evaluations at each site in the program.

The technical meeting was held December 17, 2010 with USEPA, IBS, USEPA's Contractor (CH2MHill), Exponent (IBS's risk assessors) and NRT to discuss the approach to evaluate the vapor intrusion pathway

The conference call was held September 28, 2011 with USEPA, IBS, USEPA's Contractor, Exponent, and NRT following the USEPA issuing comments on the RSLs to be used for naphthalene and ethylbenzene. These comments were focused on Wisconsin Public Service Corporation's (WPSC) Stevens Point, Marinette, and Manitowoc sites, but have programmatic implications for all of the sites managed under the Multi-site approach by IBS.

3 SITE PROGRESS

Project start dates and site prioritization for RI/FS activities were established in Exhibit A, Section A, of the Settlement Agreement. Project start dates were established for the North Branch Site – Division Street Station OU, South Branch Site – South Station Upland OU, North Shore Avenue Station Site, and Crawford Station Site. Start dates for the remaining OUs were to be initiated every six months.

The priority of the sites has been modified from the sites identified in the SOW. At this time, the South Station Upland OU (South Branch Site), Division Street Station OU (North Branch Site), Willow Street-Hawthorne Avenue Station OU (in lieu of North Shore Avenue Site), and North Station (North Branch Site) have been initiated. The remaining sites have not been initiated, however, a Time-Critical Removal Action has been initiated at the Crawford Station site.

The North Branch Sites – Division Street Station OU, Willow Street-Hawthorne Avenue Station OU, and North Station OU were initiated on November 25, 2008, April 28, 2009, and June 15, 2011, respectively, with submittal of the Completion Reports. The South Branch Site – South Station Upland OU was initiated on May 13, 2008, with submittal of the Completion Report.

An AOC for a Time-Critical Removal Action for Crawford Station was signed on October 13, 2011.

RI planning activities have been conducted for the Willow Street/Hawthorne Avenue Station OU, the North Station OU, the Division Street Station OU, and the South Station Upland OU during the reporting period. RI field activities have been performed at the South Station Upland OU and Division Street Station OU during this reporting period. Pre-design investigation sampling was also performed at Crawford Station during this reporting period. Remedial actions have not been performed at any of the sites/operable units during this reporting period.

The Annual Progress Report is intended to provide a concise summary of the progress of the work completed at each of the MGP sites. As part of the progress report, the anticipated progress (as presented in the SOW and the Master Schedule Update dated October 28, 2010 (NRT, 2010(n))) is compared to the actual progress.

3.1 Overview Progress Meetings

A program overview meeting was not held during this time period

3.2 South Station Upland OU (South Branch Site)

The Project Start Date for the South Station Upland OU was established in Exhibit A, Section A, to coincide with the effective date of the Settlement Agreement (October 31, 2008). However, Completion Report – Revision 0 was submitted on May 13, 2008, prior to finalizing the Settlement Agreement. Per the SOW, scoping meetings and conference calls may be used to discuss the content of South Station Upland OU site-specific documents. No scoping meetings or conference calls were conducted for the South Station Upland OU during the reporting period.

On September 13, 2011, USEPA modified the Settlement Agreement to modify the site boundaries of the South Station Upland OU. The modification excluded Parcels C and D from the Settlement Agreement because review of existing data indicates the source removal has been complete and no further remedial action is planned or anticipated on these parcels.

3.2.1 Planning Documents and Work Plan Submittals

Planning documents and work plan submittals are summarized in the following table:

Task/Submittal	Targeted Completion Date	Actual Completion Date	USEPA Comments Received
Receive Additional USEPA Comments on Supplemental RI Activities – Vapor Intrusion Technical Memorandum (2010o)	--	--	November 9, 2010
Respond to Additional USEPA's Comments (received November 9, 2010) on Supplemental RI Activities – Vapor Intrusion Technical Memorandum (2010p and 2010q)	--	December 23, 2010	January 21, 2011
Respond to Additional USEPA's Comments (received January 21, 2011) on Supplemental RI Activities – Vapor Intrusion Technical Memorandum (2010r)	--	February 21, 2011	USEPA Approval March 17, 2011
Submit RI Report – Revision 0 to USEPA ¹	April 21, 2011	--	--
Submit Alternatives Array Tech Memo to USEPA	June 20, 2011	--	--
Submit FS Report – Revision 0 to USEPA	October 3, 2011		



1 The submittal date was established in the 2010 Annual Progress Report and Master Schedule Update (NRT, 2010(n)) and assumed the Supplemental RI Field Activities Technical Memorandum was approved by mid-November 2010. These activities were approved in March 2011, as summarized above. Supplemental RI activities have been initiated, as discussed in Section 3.2.2. The RI Report submittal date is to be re-established. Future activities and submittals are discussed in Section 4.

3.2.2 Remedial Investigation Field Activities

RI field activities as described in the SSWP (2009a), were initiated in May 2009 as summarized in the 2009 to 2010 Annual Progress Report (2009e) and the monthly progress reports. Continued RI activities performed at the South Station Upland OU during this progress report period, are summarized in the following table.

Task	Targeted Completion Date	Actual Completion Date
Sixth Groundwater Monitoring Event	January 2011	January 25-27, 2011
Data Validation (fifth through sixth quarter groundwater)	--	May 2011
Install Supplemental Groundwater Monitoring Wells	December 2010	September 7-9, 2011
Seventh Groundwater Monitoring Event	September 2011	September 12-14, 2011
Hydraulic Conductivity Testing	October 2011	October 3-5, 2011

3.2.3 Monthly Progress Reports

Monthly Progress Reports have been submitted by the 15th of each month (or the following 1 business day) in accordance with Section 8.1 of the SOW.

Monthly Progress Report	Submittal Date
October 2010	November 11, 2010
November 2010	December 10, 2010
December 2010	January 12, 2011
January 2011	February 14, 2011
February 2011	March 11, 2011
March 2011	April 18, 2011
April 2011	May 16, 2011
May 2011	June 14, 2011

Monthly Progress Report	Submittal Date
June 2011	July 13, 2011
July 2011	August 15, 2011
August 2011	September 15, 2011
September 2011	October 13, 2011

3.3 Division Street Station OU (North Branch Site)

The Project Start Date for the Division Street Station OU was established in Exhibit A, Section A, to coincide with the effective date of the Settlement Agreement (October 31, 2008) but was re-established to November 25, 2008. Per the SOW, scoping meetings and conference calls may be used to discuss the content of Division Street Station OU site-specific documents. One scoping meeting was held as summarized in the following table.

Topic	Date
Review RI Data, Pre- RI Report Scoping Meeting	October 20, 2011

3.3.1 Planning Documents and Work Plan Submittals

Planning documents and work plans were not anticipated to be submitted during this time period.

3.3.2 Remedial Investigation Field Activities

RI field activities related to characterizing the ambient conditions in the Chicago River, as described in the Appendix F of the USEPA-approved SSWP (2008b), were initiated in July 2010 as summarized in the following table.

Task	Targeted Completion Date	Actual Completion Date
Chicago River Upstream of the North Branch MGP Sites Sediment Sampling	December 2010	February 28, 2011
Validation of Ambient Sediment Sampling Results	--	June 10, 2011
Soil Boring/Groundwater Monitoring Well Installation	November-December 2010	March 21 through April 11, 2011

Task	Targeted Completion Date	Actual Completion Date
Soil Gas Probe Installation/Sampling	November 2010	April 12 through 14, 2011
Groundwater Monitoring Well Development	December 2010	April 11 through 18, 2011
Hydraulic Conductivity Testing	--	May 16 through 27, 2011
First Quarterly Groundwater Sampling Event	January 2011	May 3 through 4, 2011
Second Quarterly Groundwater Sampling Event	April 2011	August 22 through 24, 2011

3.3.3 Monthly Progress Reports

Monthly Progress Reports have been submitted by the 15th of each month (or the following business day) in accordance with Section 8.1 of the SOW

Monthly Progress Report	Submittal Date
October 2010	November 11, 2010
November 2010	December 10, 2010
December 2010	January 12, 2011
January 2011	February 14, 2011
February 2011	March 11, 2011
March 2011	April 18, 2011
April 2011	May 16, 2011
May 2011	June 14, 2011
June 2011	July 13, 2011
July 2011	August 15, 2011
August 2011	September 15, 2011
September 2011	October 13, 2011

3.4 Willow Street – Hawthorne Avenue Station OU (North Branch Site)

The Project Start Date for the Willow Street – Hawthorne Avenue Station OU was not established in Exhibit A, Section A, of the Settlement Agreement (October 31, 2008). The start date was established as April 30, 2009 as summarized in the 2008 to 2009 Annual Progress Report (2009e). Per the SOW, scoping meetings and conference calls may be used to discuss the content of Willow Street – Hawthorne Avenue Station OU site-specific documents. No scoping meetings or conference calls were conducted for this site during the reporting period.

3.4.1 Planning Documents and Work Plan Submittals

Planning documents and work plan submittals are summarized in the following table:

Task/Submittal	Targeted Completion Date	Actual Completion Date	USEPA Comments Received
Submit SSWP – Revision 1 (2011a)	January 26, 2011 ¹	April 18, 2011	April 28, 2011 and June 1, 2011
Submit SSWP – Revision 2 (2011c)		July 15, 2011	Conditional Approval August 30, 2011

1. The submittal date was established in the 2010 Annual Progress Report and Master Schedule Update (NRT, 2010(n)) and assumed the USEPA concurrence with responses to comments on SSWP Revision 0 were received by December 13, 2010, the concurrence was received in email the week of November 1, 2010. However, submittal of SSWP – Revision 1 was postponed to incorporate the discussions of the VI Technical Meeting (December 17, 2011).

3.4.2 Remedial Investigation Field Activities

RI field investigation activities were not completed at the Willow-Hawthorne Station OU during this reporting period.

3.4.3 Monthly Progress Reports

Monthly Progress Reports have been submitted by the 15th of each month (or the following business day) in accordance with Section 8.1 of the SOW

Monthly Progress Report	Submittal Date
October 2010	November 11, 2010
November 2010	December 10, 2010
December 2010	January 12, 2011
January 2011	February 14, 2011
February 2011	March 11, 2011
March 2011	April 18, 2011
April 2011	May 16, 2011
May 2011	June 14, 2011
June 2011	July 13, 2011
July 2011	August 15, 2011
August 2011	September 15, 2011
September 2011	October 13, 2011

3.5 North Station OU (North Branch Site)

The Project Start Date for the North Station OU was not established in Exhibit A, Section A, of the Settlement Agreement (October 31, 2008). The start date was established as June 15, 2011 as summarized in the 2010 Annual Progress Report and Master Schedule Update (NRT, 2010(n)). Per the SOW, scoping meetings and conference calls may be used to discuss the content of North Station OU site-specific documents. One scoping meeting and one conference call were held as summarized in the following table:

Topic	Date
Post Completion Report and Pre-SSWP Revision 0 Scoping Meeting	July 20, 2011
Pre-SSWP, Revision 1 Scoping Conference Call	October 26, 2011

3.5.1 Planning Documents and Work Plan Submittals

Planning documents and work plan submittals are summarized in the following table

Task/Submittal	Targeted Completion Date	Actual Completion Date	USEPA Comments Received
Submit Completion Report – Revision 0 (2011d)	June 15, 2011	June 15, 2011	July 21, 2011
Submit SSWP – Revision 0 (2011e)	August 15, 2011	August 31, 2011 ¹	October 13, 2011

1 The submittal date was modified to August 31, 2011

3.5.2 Remedial Investigation Field Activities

RI field investigation activities were not completed at the North Station OU during this reporting period. However, as part of scoping the SSWP, a site reconnaissance/habitat assessment was performed on July 19, 2011.

3.5.3 Monthly Progress Reports

Monthly Progress Reports have been submitted by the 15th of each month (or the following business day) in accordance with Section 8.1 of the SOW.

Monthly Progress Report	Submittal Date
June 2011	July 13, 2011
July 2011	August 15, 2011
August 2011	September 15, 2011
September 2011	October 13, 2011

3.6 Crawford Station

The Project Start Date for the Crawford Station was established in the 2010 Annual Progress Report and Master Schedule Update Report as December 16, 2011. PGL and USEPA entered into a Time-Critical AOC on October 13, 2011 to address a portion of the site that had MGP residuals at the surface and was accessible for removal. The Time Critical Removal is proceeding under a separate AOC and is therefore, not summarized in detail in this report which address the RI/FS activities.

3.7 Remaining PGL Sites

Additional project start dates for the remaining sites were not established in the 2010 Annual Progress Report and Master Schedule Update Report (NRT, 2010(n)).

4 PROPOSED MASTER SCHEDULE

Exhibit A of the SOW includes a schedule for major deliverables. The South Station Upland OU, Division Street Station OU, Willow Street – Hawthorne Avenue Station OU, and North Station OU have been initiated. RI field work, as described in the approved SSWPs, have been performed at the South Station Upland OU, Division Street OU and ambient sediment in the North Branch Chicago River.

Future submittals and/or activities at South Station Upland OU and Division Street Station OU are dependent on USEPA comments and approvals. The site-specific schedules for Willow-Hawthorne and North Station, presented in the SSWPs, are updated herein to provide proposed site-specific schedules for field activities and major deliverables. A proposed schedule for Crawford Station is presented herein for field activities and major deliverables. The SSWP is subject to USEPA's review/approval. As discussed in Section 3.7, Project Start Dates for remaining PGL sites are to be established.

4.1 Overview Progress Meetings

Overview progress meetings are proposed to be conducted on an as-needed basis at the request of either USEPA or IBS. Specific progress meeting dates are not proposed at this time.

4.2 Multi-Site RI Documents

The Multi-Site Documents, as described in the SOW, have been completed and approved as summarized in Section 2. Additional Multi-Site Documents are not anticipated at this time. Addendums to the multi-site documents may be issued, as appropriate, to update programmatic procedures or approaches.

4.3 Schedule for PGL Sites

Figure 1 summarizes the proposed target dates for RI/FS activities at each of the sites. The proposed target dates are generally consistent with the schedules provided in the SSWPs, adjusted to reflect current status, USEPA approvals and reasonably anticipated approvals. All site schedules are dependent on USEPA approval dates, contractor availability, and sampling seasons (particularly with respect to sediment sampling activities).

Figure 1 considers the deliverable timeframes specified in Exhibit A of the SOW (e.g , SSWPs submitted 90 days following the Completion Report submittal, finalize submittals within 45 days from receipt of USEPA comments, etc) For planning purposes, it is assumed USEPA will provide comments within 60 days of submittals for Revision 0 and provide approvals within 45 days of receiving Revision 1

The proposed schedules are subject to change Modifications to the schedule, if necessary, will be communicated to USEPA through monthly site-specific progress reports, weekly progress conference calls during RI activities, or other communications

4.3.1 South Station Upland OU (South Branch Site)

The tasks provided in the South Station Upland OU SSWP – Revision 1, dated January 26, 2009 (2009a), have been completed up to submittal of the RI Report – Revision 0 As noted in Section 3 2 2, supplemental RI field activities have been initiated in September 2011, primarily to fully delineate the groundwater plume Results of the September 2011 RI field data will be reviewed to evaluate the need for additional RI field activities

Supplemental RI field activities are anticipated to address potential vapor intrusion These tasks and on-going post RI groundwater monitoring are presented in Figure 1 and summarized in the following table

Task/Deliverable	Target Date for Completion
Monthly Progress Reports	15 th of every month
Submit Supplemental RI Technical Memorandum – Vapor Intrusion, Revision 1 (assumes second groundwater event with wells installed in Sept 2011 is performed mid December 2011 and defines groundwater plume)	February 10, 2012
Supplemental RI Field Activities (assumes USEPA approval of Supplemental RI Technical Memorandum – Vapor Intrusion, Revision 1 by mid March 2012)	Install Additional Groundwater Monitoring Wells, if needed – Mid March 2012 Install Soil Gas Probes – late March 2012 Soil Gas Sampling Event 1 – Late March 2012 Soil Gas Sampling Event 2 – Late June 2012
Submit RI Report – Revision 0 to USEPA	November 8, 2012
Alternatives Array Tech Memo to USEPA	January 7, 2013
FS Report – Revision 0 to USEPA (assumes USEPA comments on Alternatives Array Tech Memo early March 2013)	April 22, 2013
On-going Post RI Groundwater Monitoring	To be determined following review of RI Data Preliminarily proposed as quarterly

4.3.2 Division Street OU (North Branch Site)

The tasks provided in the Division Street OU SSWP – Revision 1, dated September 21, 2009 (2009f), have been completed in the upland area. The need for supplemental RI field activities in the upland areas is being evaluated and may be necessary to evaluate the extent of MGP residuals. A technical memorandum, summarizing the scope of supplemental RI field activities, will be submitted to USEPA for approval in advance of implementing the field work. A scoping meeting with USEPA to discuss the potential supplemental sampling was conducted on October 20, 2011.

The sediment adjacent to the Division Street OU will be investigated as described in the SSWP – Revision 1, dated September 21, 2009 and approved April 20, 2010 (2010d), as presented in Figure 1. Sampling rationale, locations, parameters, and frequencies are provided in the SSWP. Major deliverable target dates are summarized in the following table.

Task/Deliverable	Target Date for Completion
Monthly Progress Reports	15 th of every month
Submit Supplemental RI Technical Memorandum – Soil, Groundwater, and Soil Gas, Revision 0	January 10, 2012
Supplemental RI Field Activities - Upland (assumes USEPA approval of Supplemental RI Technical Memorandum – Vapor Intrusion, Revision 0 by early February 2012)	Sample additional soil, Install Additional Groundwater Monitoring Wells, and soil gas - Late February 2012 Supplemental GW and Soil Gas Sampling Event 1 – February 2012 Supplemental GW and Soil Gas Sampling Event 2 – May 2012
RI Field Activities – Upland	Quarterly RI groundwater monitoring – November 2011 thru February 2012
RI Field Activities - Sediment adjacent to Division Street OU (assumed concurrent with Willow Street – Hawthorne Avenue Station OU)	Bathymetric Survey – December 2011 Surface Water Sampling – December 2011 Step I Sediment Sampling (as discussed in the RAF) – January 2012 Step II Sediment Sampling (as discussed in the RAF) – if necessary, August 2012 (assumes scope is defined by June 2012 and Step II is concurrent with Step I of North Station)

Task/Deliverable	Target Date for Completion
Submit RI Report – Revision 0 to USEPA	February 17, 2013
Alternatives Array Tech Memo to USEPA	March 18, 2013
Submit FS Report – Revision 0 to USEPA	July 1, 2013
On-going Post RI Groundwater Monitoring	To be determined following review of RI Data Preliminarily proposed quarterly

4.3.3 Willow Street – Hawthorne Avenue Station OU (North Branch Site)

The Willow Street – Hawthorne Avenue Station OU SSWP – Revision 2 was submitted to USEPA on July 15, 2011 (2011c) and conditionally approved on August 30, 2011. The following schedule has been updated since submittal of the revised schedule with the September progress report, dated October 13, 2011. The schedule for implementing upland remedial investigations and report submittals (RI and FS) will be established when site access has been secured.

Task/Deliverable	Target Date for Completion
Monthly Progress Reports	15 th of every month
RI Field Activities - Upland	Soil Boring Installation/Soil Vapor Sampling – TBD Groundwater Monitoring Well Installation/Development – TBD Quarterly RI groundwater monitoring – TBD
RI Field Activities - Sediment adjacent to Willow Street-Hawthorne Avenue Station OU (assumed concurrent with Division Street Station OU)	Bathymetric Survey – December 2011 Surface Water Sampling – December 2011 Step I Sediment Sampling (as discussed in the RAF) – January 2012 Step II Sediment Sampling (as discussed in the RAF) – if necessary, August 2012 (assumes scope is defined by June 2012 and Step II is concurrent with Step I of North Station)
Submit RI Report – Revision 0 to USEPA	TBD
Alternatives Array Tech Memo to USEPA	TBD

Task/Deliverable	Target Date for Completion
Submit FS Report – Revision 0 to USEPA	TBD
On-going Post RI Groundwater Monitoring	To be determined following review of RI Data

4.3.4 North Station OU (North Branch Site)

The North Station OU SSWP – Revision 0 was submitted to USEPA on August 31, 2011 (2011e) USEPA comments were received October 13, 2011 and a SSWP Revision 1 will be submitted on November 28, 2011. The following schedule assumes USEPA will approve SSWP Revision 1 within 45 days of receiving the document.

Task/Deliverable	Target Date for Completion
Monthly Progress Reports	15 th of every month starting in July 2011
Submit SSWP – Revision 1 to USEPA	November 28, 2011
RI Field Activities – Upland (assumes USEPA approval of SSWP by mid January 2012)	Soil Boring Installation/Sampling – March 2012 Groundwater Monitoring Well Installation – March 2012 Soil Gas Probe Installation – March 2012 Quarterly RI Groundwater Monitoring – April 2012 through January 2013)
RI Field Activities - Sediment adjacent to North Station OU (assumed Step I Sampling is concurrent with Division Street Station and Willow Street – Hawthorne Avenue Station OU Step II Sampling)	Bathymetric Survey – August 2012 Surface Water Sampling – August 2012 Step I Sediment Sampling (as discussed in the RAF) – August 2012 Step II Sediment Sampling (as discussed in the RAF) – if necessary, March 2013 (assumes scope is defined by early March 2013)
Submit RI Report – Revision 0 to USEPA	July 22, 2013
Alternatives Array Tech Memo to USEPA	September 20, 2013
Submit FS Report – Revision 0 to USEPA	January 3, 2014

4.3.5 Crawford Station

The project start date for the Crawford Station is proposed as December 16, 2011. A detailed proposed schedule will be developed as part of the SSWP. Due to the size and multiple property owners at Crawford Station, it is proposed the site will be subdivided into more manageable Parcel Groups in the SSWP. Parcel Groups will be mutually identified with USEPA and IBS and may be selected based on access, adjacent parcels, or other criterion. Parcel Groups will range in area. For purposes of planning, target completion dates for RI activities at the first Parcel Group are included herein. The number of Parcel Groups to be established and the start dates are to be determined. Proposed target dates for Parcel Group 1, after submittal of the Completion Report (summarized below), are provided as general placeholders for planning purposes only and may be significantly different, depending on USEPA approvals.

Task/Deliverable	Target Date for Completion
Monthly Progress Reports	15 th of every month starting in January 2012
Submit Completion Report – Revision 0 to USEPA (Project Start Date)	December 16, 2011
Submit Parcel Group 1 SSWP – Revision 0 to USEPA	March 15, 2012
Initiate Parcel Group 1 RI Field Work (USEPA approval of SSWP assumed in July 2012)	October 2012 – Upland
Submit RI Report – Revision 0 to USEPA	November 14, 2013
Alternatives Array Tech Memo to USEPA	January 13, 2014
Submit FS Report – Revision 0 to USEPA	April 28, 2014

4.3.6 Throop Station OU (South Branch Site)

The project start date for the Throop Station OU (South Branch Site) is proposed as June 20, 2012. A detailed proposed schedule will be developed as part of the SSWP. Proposed target dates, after submittal of the Completion Report (summarized below), are provided as general placeholders for planning purposes only and may be significantly different, depending on USEPA approvals.

Task/Deliverable	Target Date for Completion
Monthly Progress Reports	15 th of every month starting in July 2012
Submit Completion Report – Revision 0 to USEPA (Project Start Date)	June 20, 2012
Submit SSWP – Revision 0 to USEPA	September 17, 2012
Initiate RI Field Work (to be provided in SSWP, USEPA approval assumed in January 2013)	February 2013 – Upland May 2013 – Sediment
Submit RI Report – Revision 0 to USEPA	2014

4.3.7 Hough Place Station OU (South Branch Site)

The project start date for the Hough Place Station OU (South Branch Site) is proposed as December 17, 2012. A detailed proposed schedule will be developed as part of the SSWP. Proposed target dates, after submittal of the Completion Report (summarized below), are provided as general placeholders for planning purposes only and may be significantly different, depending on USEPA approvals.

Task/Deliverable	Target Date for Completion
Monthly Progress Reports	15 th of every month starting in January 2013
Submit Completion Report – Revision 0 to USEPA (Project Start Date)	December 17, 2012
Submit SSWP – Revision 0 to USEPA	March 18, 2013
Initiate RI Field Work (to be provided in SSWP, USEPA approval assumed in July 2013)	August 2013 – Upland October 2013 – Sediment
Submit RI Report – Revision 0 to USEPA	2014

4.4 Remaining PGL Sites

Proposed Project Start Dates and target dates for the remaining sites have not been established pending progress of the initiated sites, discussed in Section 4.3. It is anticipated Project Start Dates may be established as part of future Progress Meetings (Section 4.1) or in the 2012 Master Schedule Update. Detailed proposed schedules will be developed as part of the SSOWPs.

5 REFERENCES

- 2007(a) August 2, 2007 Revision 2, Multi-Site Health and Safety Plan, for Former Manufactured Gas Plant Sites, prepared for Integrlys
- 2007(b) August 5, 2007 Revision 0, Generalized Conceptual Site Model, for Former Manufactured Gas Plant Sites, prepared for Integrlys
- 2007(c) September 4, 2007 Revision 2, Multi-Site Quality Assurance Project Plan, for Former Manufactured Gas Plant Sites, prepared for Integrlys
- 2007(d) September 5, 2007 Revision 2, Exponent, Multi-Site Risk Assessment Framework, for Former Manufactured Gas Plant Sites.
- 2008(c) October 31, 2008 United States Environmental Protection Agency and Peoples Gas Light and Coke Company, *Settlement Agreement and Administrative Order on Consent for Remedial Investigations and Feasibility Studies at Four Peoples Gas MGP Sites in Chicago, Illinois* U S EPA Region 5, CERCLA Docket No V-W-08-C-917
- 2008(a) September 8, 2008 Revision 4, Multi-Site Field Sampling Plan, for Former Manufactured Gas Plant Sites
- 2009(a) January 26, 2009 Burns and McDonnell, Site-Specific Work Plan, Revision 1, South Station Upland Operable Unit, Chicago, Illinois
- 2009(b) July 16, 2009 Revision 0 Multi-Site Feasibility Study Support Documents, for Former Manufactured Gas Plant Sites, prepared for Integrlys
- 2009(c) September 21, 2009 Burns and McDonnell, Site-Specific Work Plan, Revision 0, Willow Street – Hawthorne Avenue Station Operable Unit, Chicago, Illinois
- 2009(d) October 6, 2010 United States Environmental Protection Agency Email Regarding Hold on Scoping Meetings/Delaying Throop Street Station Start Date
- 2009(e) November 2, 2009. Burns and McDonnell, 2008 to 2009 Annual Progress Report, South Branch Site and North Branch Site, Chicago, Illinois, The Peoples Light, Gas and Coke Company
- 2009(f) September 21, 2009 Burns and McDonnell, Site-Specific Work Plan, Revision 1, Division Street Station Operable Unit, Chicago, Illinois
- 2010(a) March 17, 2010 United States Environmental Protection Agency Comments on Revision 0 Multi-Site Feasibility Study Support Documents, for Former Manufactured Gas Plant Sites, prepared for Integrlys
- 2010(b) March 24, 2010 United States Environmental Protection Agency Email Regarding Revised Schedule Request – South Station Approval

- 2009(c) March 26, 2010 Revision 1 Multi-Site Feasibility Study Support Documents, for Former Manufactured Gas Plant Sites, prepared for Integrlys
- 2010(d) April 20, 2010 United States Environmental Protection Agency Approval of Revision 1 Multi-Site Feasibility Study Support Documents, for Former Manufactured Gas Plant Sites, prepared for Integrlys
- 2010(e) June 3, 2010 United States Environmental Protection Agency Comments on Site-Specific Work Plan, Willow Street – Hawthorne Avenue Station Operable Unit, Chicago, Illinois
- 2010(f) July 6, 2010 Natural Resource Technology, Inc Response to USEPA Comments dated June 3, 2010 on Site-Specific Work Plan, Willow Street – Hawthorne Avenue Station Operable Unit, Chicago, Illinois
- 2010(g) July 8, 2010 Natural Resource Technology, Inc Technical Memorandum for Supplemental RI Field Work – Vapor Intrusion, Revision 0, South Station Operable Unit, Chicago, Illinois
- 2010(h) August 19, 2010 United States Environmental Protection Agency Additional Comments on Site-Specific Work Plan, Revision 0, Willow Street – Hawthorne Avenue Station Operable Unit, Chicago, Illinois
- 2010(i) July 8, 2010 United States Environmental Protection Agency Comments on Technical Memorandum for Supplemental RI Field Work – Vapor Intrusion, Revision 0, South Station Operable Unit, Chicago, Illinois
- 2010(j) September 20, 2010. Natural Resource Technology, Inc Response to USEPA Additional Comments dated August 19, 2010 on Site-Specific Work Plan, Revision 0, Willow Street – Hawthorne Avenue Station Operable Unit, Chicago, Illinois
- 2010(k) September 27, 2010 Natural Resource Technology, Inc Supplement to Characterization of Ambient Conditions in the Chicago River Upstream of the North Branch MGP Sites Technical Memorandum (rev 9/27/10), Chicago, Illinois, Peoples Gas and Light Company CERCLA Docket No V-W-'08-C-917
- 2010(l) September 30, 2010. United States Environmental Protection Agency. Approval of Supplement to Characterization of Ambient Conditions in the Chicago River Upstream of the North Branch MGP Sites Technical Memorandum (rev 9/27/10), Chicago, Illinois, Peoples Gas and Light Company CERCLA Docket No. V-W-'08-C-917
- 2010(m) October 7, 2010. Natural Resource Technology, Inc. Response to USEPA's Comments (dated September 7, 2010) Technical Memorandum for Supplemental RI Field Work – Vapor Intrusion, Revision 0, South Station Operable Unit, Chicago, Illinois
- 2010 (n) October 28, 2010, Natural Resource Technology, Inc 2010 Annual Progress Report and Master Schedule Update, Remedial Investigation/Feasibility Study, Peoples Gas Light and Coke Company, Former Manufactured Gas Plant Sites, CERCLA V-W-08-C-917, Revision 0.
- 2010(o) November 9, 2010 United States Environmental Protection Agency. Additional Comments on the Technical Memorandum for Supplemental RI Field Work – Vapor Intrusion, Revision 0, South Station Operable Unit, Chicago, Illinois

- 2010(p) December 23, 2010 Natural Resource Technology, Inc. Response to USEPA's Additional Comments (dated November 9, 2010) Technical Memorandum for Supplemental RI Field Work – Vapor Intrusion, Revision 0, South Station Operable Unit, Chicago, Illinois
- 2010(q) January 21, 2011. United States Environmental Protection Agency Additional Comments on the Technical Memorandum for Supplemental RI Field Work – Vapor Intrusion, Revision 0, South Station Operable Unit, Chicago, Illinois
- 2010(r) February 21, 2011 Natural Resource Technology, Inc. Response to USEPA's Additional Comments (dated January 21, 2011) Technical Memorandum for Supplemental RI Field Work – Vapor Intrusion, Revision 0, South Station Operable Unit, Chicago, Illinois
- 2011(a) April 18, 2011 Natural Resource Technology, Inc. Site-Specific Work Plan, Willow Street/Hawthorne Avenue Station Operable Unit, Revision 1, Chicago, Illinois
- 2011(b) April 20, 2011 Exponent, Multi-Site Risk Assessment Framework Addendum, Former Manufactured Gas Plant Sites, North Shore Gas Company CERCLA Docket No V-W-07-C-877, Peoples Gas Light and Coke Co CERCLA Docket No V-W-08-C-917, Wisconsin Public Service Corporation CERCLA Docket No V-W-06-C-847
- 2011(c) July 15, 2011 Natural Resource Technology, Inc. Site-Specific Work Plan, Willow Street/Hawthorne Avenue Station Operable Unit, Revision 2, Chicago, Illinois
- 2011(d) June 15, 2011 Natural Resource Technology, Inc. Completion Report, North Station Operable Unit, Revision 0, Chicago, Illinois
- 2011(e) August 31, 2011 Natural Resource Technology, Inc. Site-Specific Work Plan, North Station Operable Unit, Revision 0, Chicago, Illinois

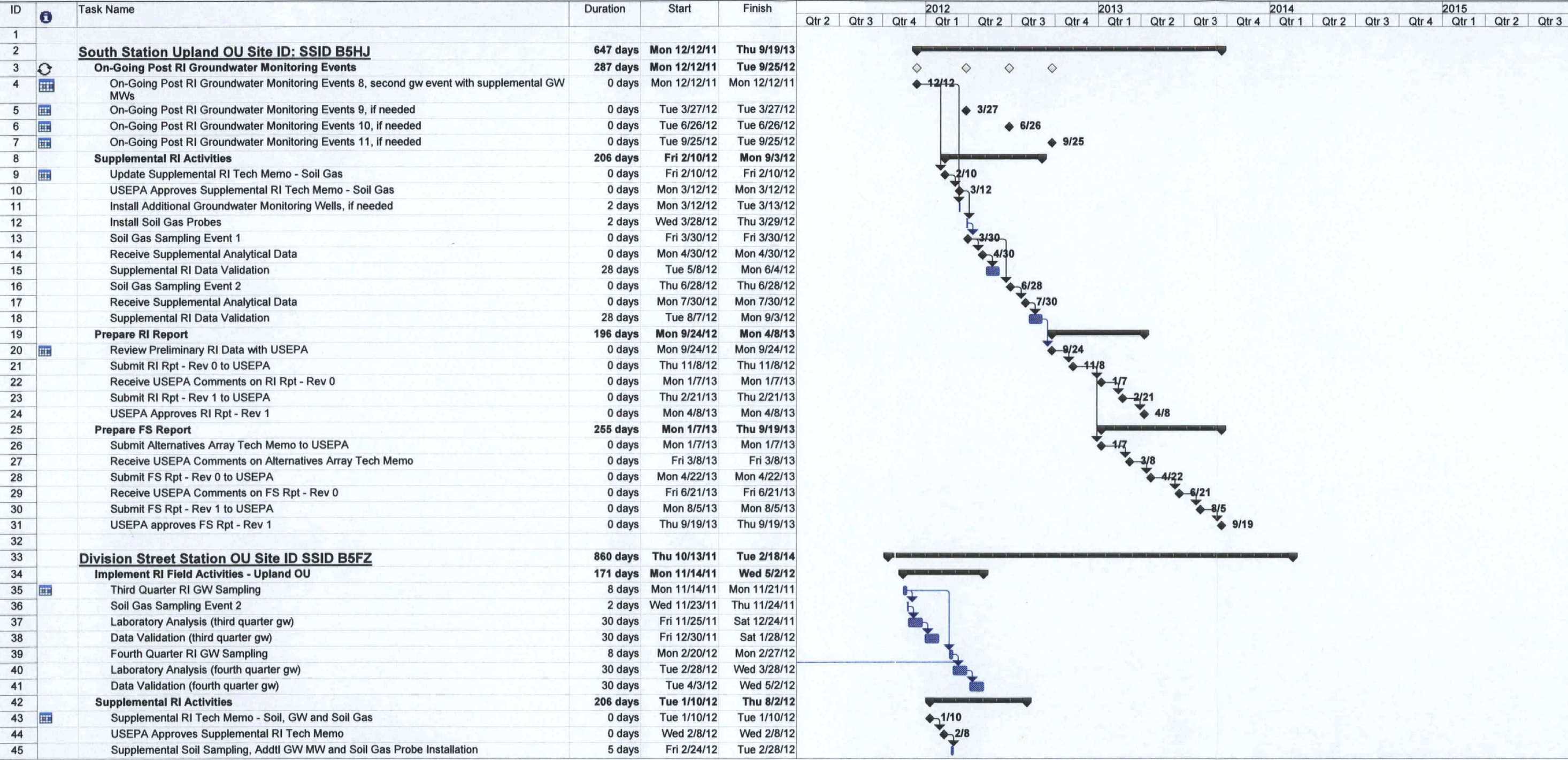




FIGURES

FIGURE 1
2011 Master Schedule Update - Revision 0
Peoples Gas Light and Coke Company Former Manufactured Gas Plant Sites
CERCLA Docket No. (V-W-08-C-917)

October 28, 2011



Project: 1982 IBS SAS NSG MGP prop
Date: Fri 10/28/11

Task

Split

Milestone

Summary

Project Summary

External Tasks

External Milestone

Inactive Task

Inactive Milestone

Inactive Summary

Manual Task

Duration-only

Manual Summary Rollup

Manual Summary

Start-only

Finish-only

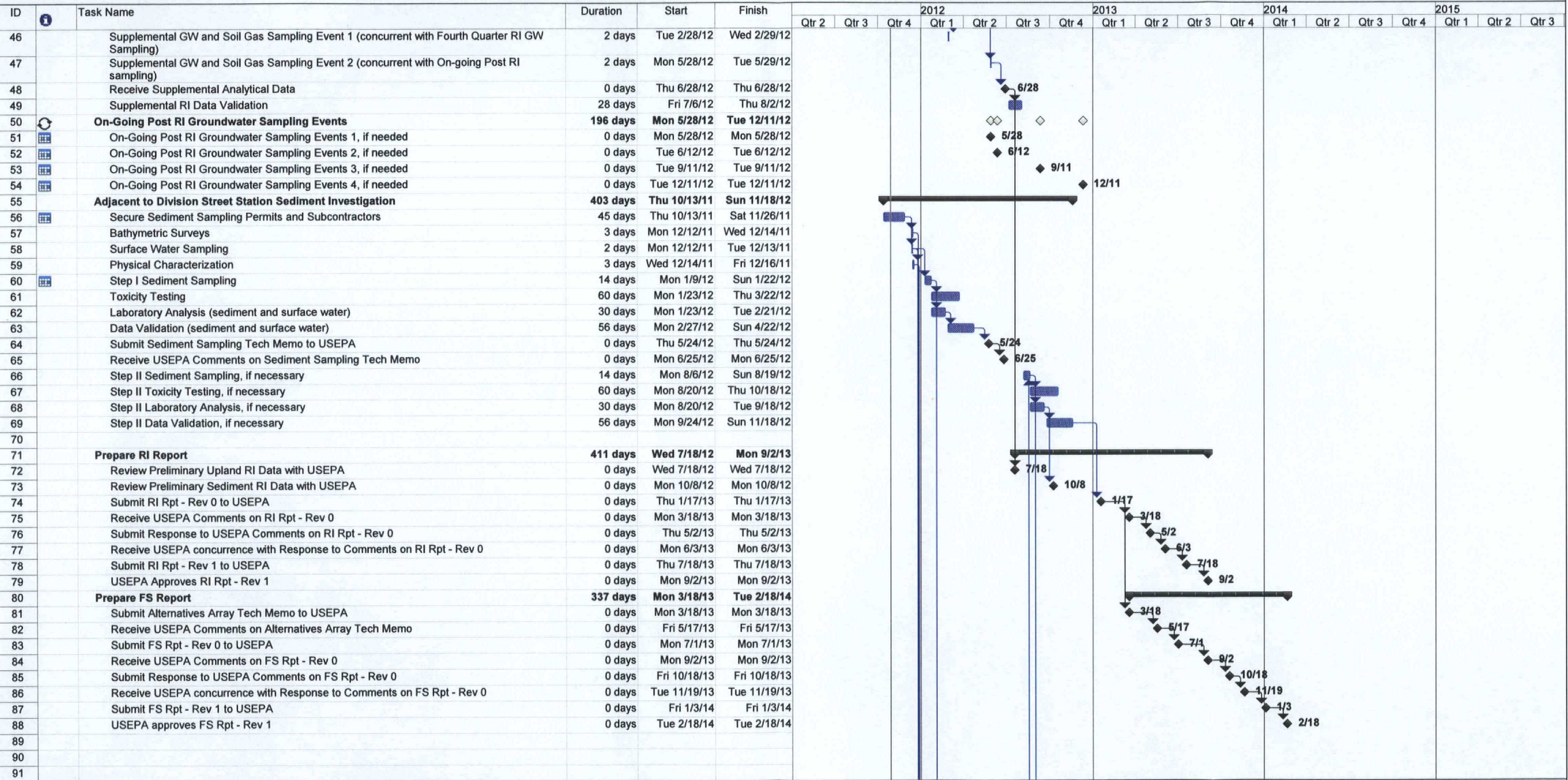
Progress

Deadline

FIGURE 1
2011 Master Schedule Update - Revision 0
Peoples Gas Light and Coke Company Former Manufactured Gas Plant Sites

October 28, 2011

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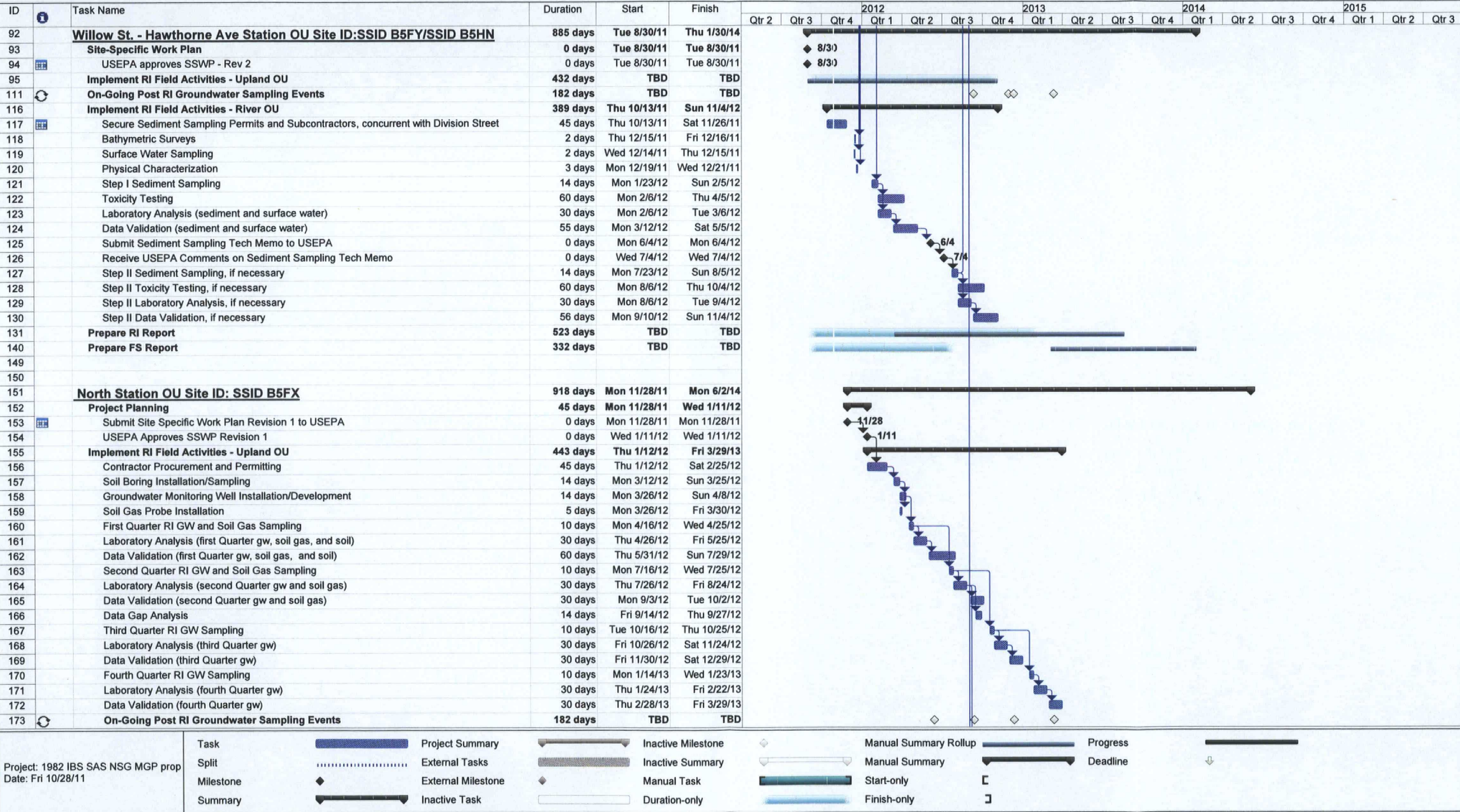
Start-only

Finish-only

Progress

Deadline

CERCLA Docket No. (V-W-08-C-917)

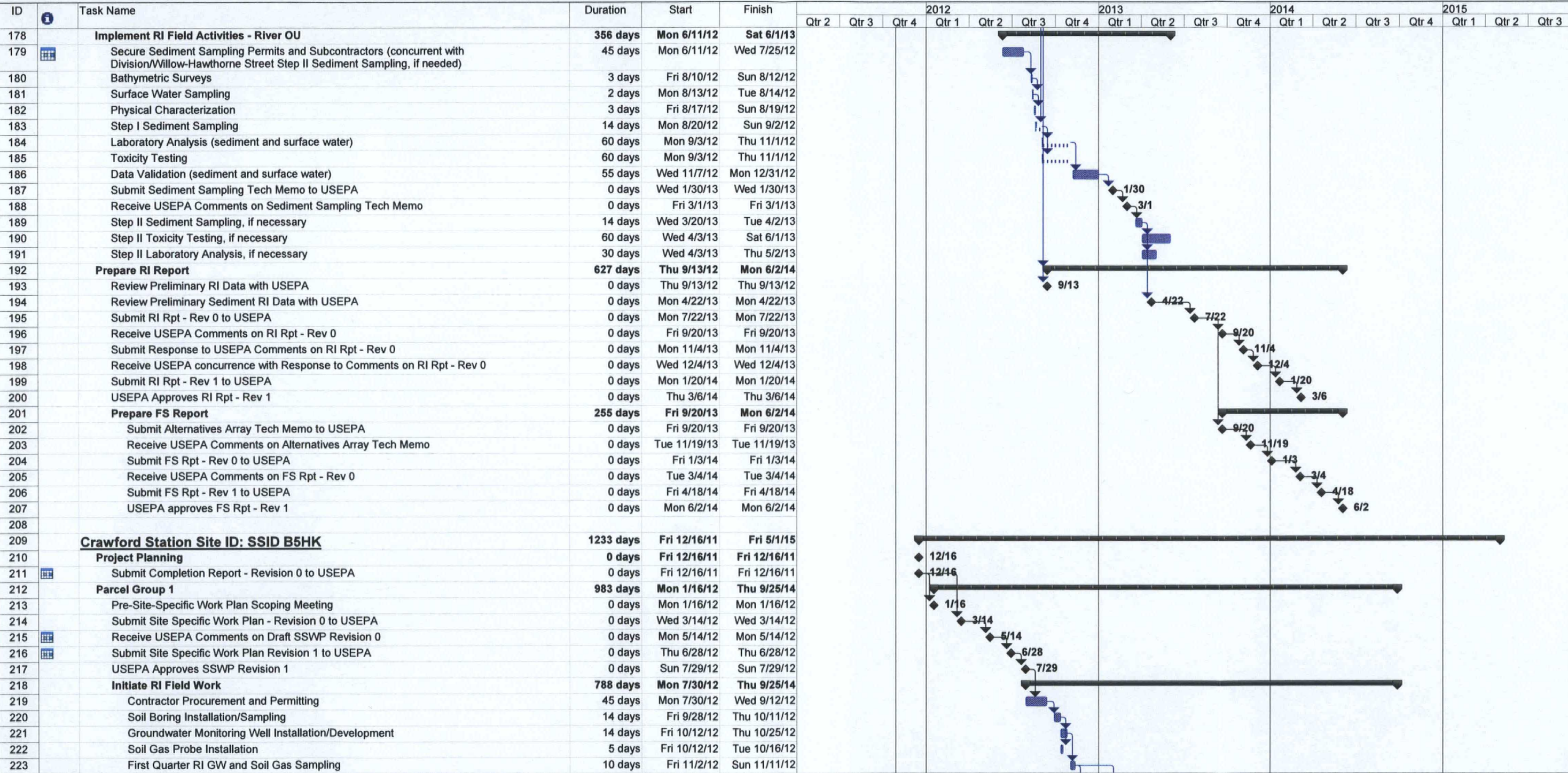


1. This preliminary schedule is dependent on USEPA-approval and weather conditions to complete field investigations. Schedule modifications will be in accordance with the AOC/SOW (CERCLA Docket No. V-W-08-C-917)

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2011 Master Schedule Update - Revision 0
Peoples Gas Light and Coke Company Former Manufactured Gas Plant Sites

October 28, 2011

CERCLA Docket No. (V-W-08-C-917)



Project: 1982 IBS SAS NSG MGP prop
Date: Fri 10/28/11

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Progress

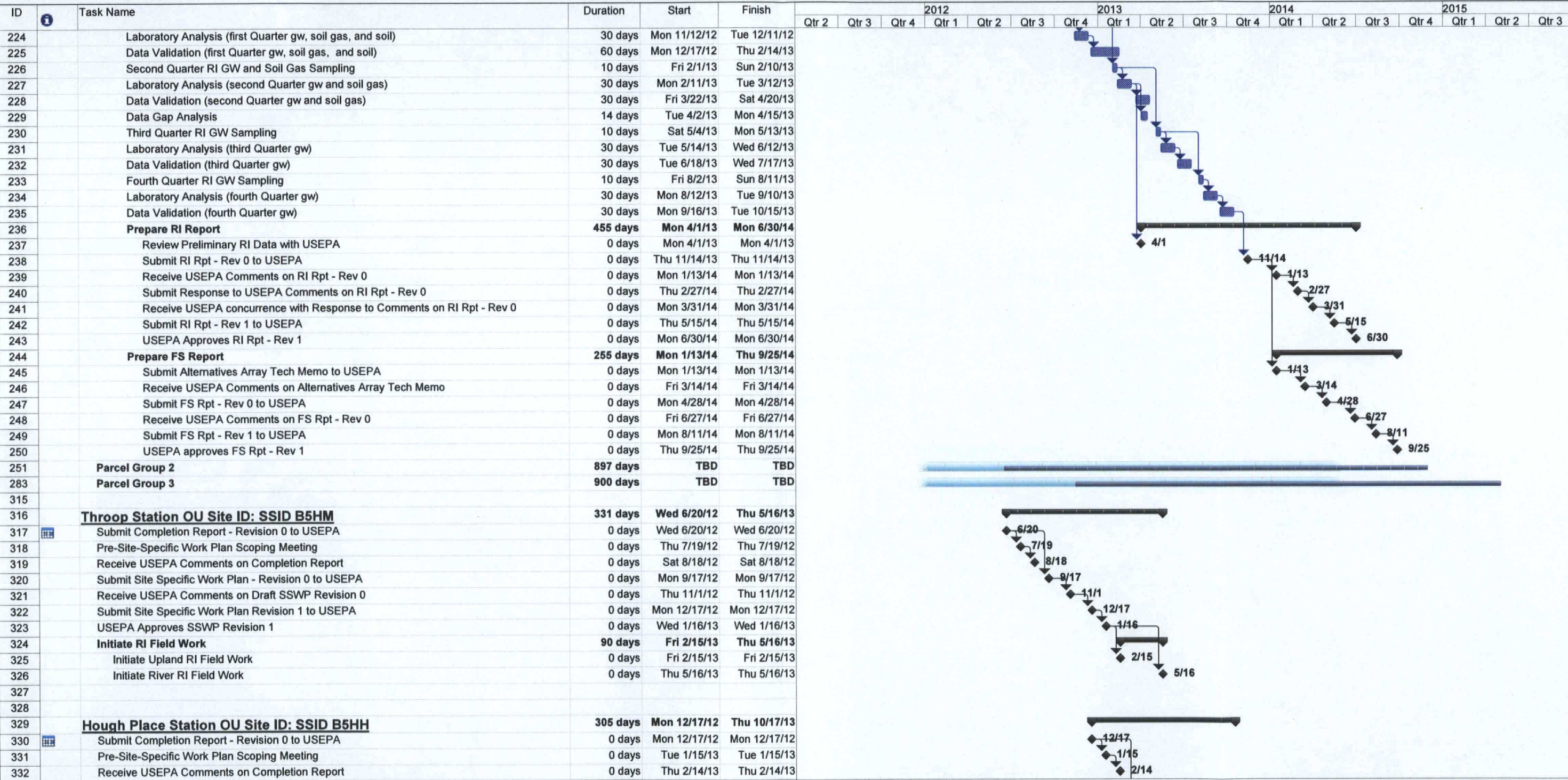
Deadline

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FIGURE 1
2011 Master Schedule Update - Revision 0
Peoples Gas Light and Coke Company Former Manufactured Gas Plant Sites

October 28, 2011

CERCLA Docket No. (V-W-08-C-917)



Project: 1982 IBS SAS NSG MGP prop Date: Fri 10/28/11	Task		Project Summary		Inactive Milestone		Manual Summary Rollup		Progress	
	Split		External Tasks		Inactive Summary		Manual Summary		Deadline	
	Milestone		External Milestone		Manual Task		Start-only			
	Summary		Inactive Task		Duration-only		Finish-only			

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FIGURE 1
2011 Master Schedule Update - Revision 0
Peoples Gas Light and Coke Company Former Manufactured Gas Plant Sites
CERCLA Docket No. (V-W-08-C-917)

ID	Task Name	Duration	Start	Finish	2012				2013				2014				2015				
					Qtr 2	Qtr 3	Qtr 4	Qtr 1	Qtr 2	Qtr 3	Qtr 4	Qtr 1	Qtr 2	Qtr 3	Qtr 4	Qtr 1	Qtr 2	Qtr 3			
333	Submit Site Specific Work Plan - Revision 0 to USEPA	0 days	Mon 3/18/13	Mon 3/18/13																	
334	Receive USEPA Comments on Draft SSWP Revision 0	0 days	Thu 5/2/13	Thu 5/2/13																	
335	Submit Site Specific Work Plan Revision 1 to USEPA	0 days	Mon 6/17/13	Mon 6/17/13																	
336	USEPA Approves SSWP Revision 1	0 days	Fri 7/19/13	Fri 7/19/13																	
337	Initiate RI Field Work	59 days	Mon 8/19/13	Thu 10/17/13																	
338	Initiate Upland RI Field Work	0 days	Mon 8/19/13	Mon 8/19/13																	
339	Initiate River RI Field Work	0 days	Thu 10/17/13	Thu 10/17/13																	
340																					
341	22nd Street Station OU Site ID: B5FW	0 days	Mon 10/31/11	Mon 10/31/11																	
342	Project Start Date to be Established in October 2012 Master Schedule Update	0 days	Mon 10/31/11	Mon 10/31/11																	
343																					
344	North Shore Avenue Station Site ID: SSID B5HL	0 days	Mon 10/31/11	Mon 10/31/11																	
345	Project Start Date to be Established in October 2012 Master Schedule Update	0 days	Mon 10/31/11	Mon 10/31/11																	
346																					
347	Pitney Court Station OU Site ID: SSID B5HP	0 days	Mon 10/31/11	Mon 10/31/11																	
348	Project Start Date to be Established in October 2012 Master Schedule Update	0 days	Mon 10/31/11	Mon 10/31/11																	
349																					
350	South Branch River OU	0 days	Mon 10/31/11	Mon 10/31/11																	
351	Project Start Date to be Established in October 2012 Master Schedule Update	0 days	Mon 10/31/11	Mon 10/31/11																	

Project: 1982 IBS SAS NSG MGP prop
Date: Fri 10/28/11

Task

Split

Milestone

Summary

Project Summary

External Tasks

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Inactive Task

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Manual Task

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Manual Summary

Start-only

Finish-only

Progress

Deadline



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Mr. Ross del Rosario
Remedial Project Managers
USEPA, Region 5
77 W. Jackson Boulevard
Chicago, IL 60604-3590

October 28, 2011
(1982/5.0)

RE: 2011 Annual Progress Report and Master Schedule Update – Revision 0
Peoples Gas Light and Coke Company's Former Manufactured Gas Plant Sites
CERCLA Docket No.: V-W-08-C-917

Dear Mr. del Rosario:

On behalf of Integrys Business Support, LLC (IBS), managing Peoples Gas Light and Coke Company's (PGL) former manufactured gas plant (MGP) sites, please find enclosed two hard copies of the 2011 Annual Progress Report and Master Schedule Update for the Chicago sites. This report summarizes activities performed between October 31, 2010 and October 28, 2011 and provides a proposed schedule for future activities.

This 2011 Annual Progress Report has been prepared in accordance with Task 8, Subtask 8.2, of the Statement of Work (SOW) attached to the Settlement Agreement and Administrative Order on Consent (Settlement Agreement) between the United States Environmental Protection Agency (USEPA) and PGL, effective October 31, 2008.

Please do not hesitate to contact Mr. Naren Prasad (IBS) at 312.240.4569 if you have any questions regarding this document.

Sincerely,

NATURAL RESOURCE TECHNOLOGY, INC.

Handwritten signature of Jennifer M. Kahler in black ink.

Jennifer M. Kahler, PE
Senior Engineer

Handwritten signature of Laurie L. Parsons in black ink.

Laurie L. Parsons, PE
Principal Engineer

Enc.: As noted above (2 hard copies and 2 CD copies)

cc: Ms. Joan Tanaka (hard copy and CD copy)
Mr. Brian Bartoszek, IBS (w/o attachments)
Mr. Naren Prasad, IBS (hard copy and CD copy)
Mr. Doyle Wilson, IEPA (hard copy and CD copy)
Mr. Mark Thimke, Foley & Lardner (w/o attachments)
Mr. Dave Klatt, USEPA Contractor – CH2MHill (hard copy and CD copy)

1982 PGL Annual Progress and Schedule Update R del Rosario trans 111028

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